



Fluttering B Butterfly Ranch <rla6200@flash.net >
03/26/2002 05:00:12 PM

Record Type: Record

To: John Morrall@EOP

cc:

Subject: Comments Regarding Federal Regulations Including Federal Regulations Affecting Small Business

To whom it may concern,

My name is Leslie Lange and I am the owner and operator of The Fluttering B Butterfly Ranch in Colleyville, TX. I raise butterflies for release at special occasions and for educational purposes and am one of approximately 150 butterfly farmers in the US. A good percentage of butterfly farmers are women.

I am writing to voice my concerns about Proposed Rules, Docket No. 95-095-2. These regulations concern the Plant Pest Regulations.

Currently, the regulations allow for nine species of butterflies to be shipped across state lines with a PPQ 526 permit. The Proposed Rules, Docket No. 95-095-2 would prevent all species, except for the Vanessas, from being shipped out of state. The only impact study performed, according to the Regulatory Flexibility Act, concerned small research facilities only. The butterfly farming industry was not considered in the impact of the Proposed Rules.

Since at least 50% of my income would be affected by Docket No. 95-095-2, these rules would effectively shut my business down. I am not alone in my concerns as many of my colleagues are very concerned about the Proposed Rules.

Below is some correspondence between a fellow colleague of mine and Dr. Wayne Wehling of APHIS. You will see his bias about small business concerns in these emails.

Wouldn't it be a basic courtesy of our government's regulatory bodies to consult or seek input from the affected business industry or trade organization representing that industry? Please **keep** in mind that this industry has no history of abuses or adverse environmental impacts.

Thank you in advance for your attention in this matter

Best regards,
Leslie Lange

> ----- Original Message -----
> From: "W PERRY PAYNE" <wppayne@ktc.com >
> To: "Wayne F Wehling" <Wayne.F.Wehling@usda.gov >
> Sent: Wednesday, June 27, 2001 4:19 PM
> Subject: Re: Florida and lower east coast or Atlantic Coast
>
>
> > Wayne,
> >

> > Thanks for the detailed response.
> >
> > Here is my problem. I, in no way am I challenging your policy on Florida
> > based on the
> > good for the Monarch or any other butterfly, but since you did not include
> > the IBBA in the decision making process and the chance to have any input,
> > I
> > am extremely concerned that the butterfly industry will be left out of
> > future discussions on policy. I see no reason that this was not done. I
> > also do not believe that policies can be implemented with complete
> > disregard
> > to small business concerns. This I will have to check into.
> >
> > My request for all the notes, correspondences and other material used to
> > analyzed the available information to reach the conclusion to implement
> > this
> > policy is based only for the purpose to fully understand how the process
> > works so the butterfly industry will not be left out of future policy
> > discussions and decisions. The butterfly industry needs to understand how
> > this information was used. To this end, I make the request of the above
> > mentioned material.
> >
> > I also need to make it clear that I in no way represent the IBBA in any
> > official capacity. I am only a member of the organization and I am no
> > longer on the BOD. My references to the IBBA are only as a concerned
> > member
> > of our trade organization.
> >
> > Thanks
> > Perry

----- Original Message -----

From: "Wayne F Wehling" <Wayne.F.Wehling@usda.gov >

To: <wppayne@kfc.com >

Sent: Thursday, June 28, 2001 7:22 AM

Subject: Re: Florida and lower east coast or Atlantic Coast

> Perry,

>

> I understand your concerns regarding IBBA and small business. My decision
was based on science alone. I pursued sources of information that I knew
would have information to assist me in my decision. I felt that small
business should not be affected by this decision, however it would have been
a good idea to ask about impacts. For the most part, I would need to ignore
business impacts, and act based on safeguarding the butterfly. One concern
I have is that it is much easier to lower restrictions later than it would
be to raise them. This is especially true given the growth in this
industry.

>

> Cheers,

>

> Wayne

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